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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

RIA R SQUARED, INC.,)	
a Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	Case No. 21-CV-125
)	
PAUL D. MCCOWN, AND)	
MCCOWN ENTERPRISES, LLC,)	
a Wyoming Limited Liability Company)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Ria R Squared, Inc. (“R Squared”), by and through its counsel of record, hereby moves the Court for an entry of partial summary judgment in its favor as follows:

1. Rule 56(a) of the Federal Rules of Civil Procedure provides in relevant part that: “A party may move for summary judgment, identifying each claim or defense—or part of each claim or

defense—on which summary judgment is sought. The court shall grant summary judgment if the movant shows that there is no genuine issue of material fact and the movant is entitled to judgment as a matter of law. The court should state on the record the reasons for granting or denying the motion.” FED. R.Civ.P. 56(a).

2. This Court has already granted summary judgment in favor of R Squared on its claim for fraud in the inducement/intentional misrepresentation. *See* ECF No. 72.

3. R Squared now moves for summary judgment on its remaining claims for breach of contract, breach of the duty of good faith and fair dealing, and piercing the corporate veil. In addition, R Squared moves for summary judgment on its claim for punitive damages, as well as prejudgment and post-judgment interest on all judgments entered in this matter.

4. As presented in the supporting materials, there are no genuine issues of material fact and R Squared is entitled to judgment as a matter of law.

5. Plaintiff supports this motion, pursuant to Rule 56(c) of the Federal Rules of Civil Procedure, by relying upon all pleadings found in the record, affidavits or declarations, answers, or materials generally found in the record, to include the *Memorandum in Support of Motion for Summary Judgment*, filed concurrently herewith, and its accompanying exhibits.

WHEREFORE, R Squared respectfully requests the Court enter summary judgment in its favor and set the matter for hearing regarding R Squared’s damages, including punitive damages.

Respectfully submitted this 31st day of October, 2022.

RIA R SQUARED, INC.,
a Delaware corporation,

Plaintiff.

By: /s/: Ryan L. Ford

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing pleading was served upon counsel of record via the ECF/CM Filing System (or otherwise as indicated below).

Jason Tangeman	<input checked="" type="checkbox"/> Electronic Delivery ECF/CM
Nicholas & Tangeman	<input type="checkbox"/> Fax
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By: /s/: Ryan L. Ford